

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

JOANN INC, *et al.*,

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Hearing Date: Aug. 14, 2025 at 10 a.m.

Objection Date: August 7, 2025 at 4 p.m.

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT the undersigned counsel has filed the Motion of OOCL USA Inc., *et al.* for allowance and payment of an administrative expense pursuant to 11 U.S.C. § 503(b) (the “Motion”).

PLEASE TAKE FURTHER NOTICE THAT if you wish to respond to the Motion, you are required to file such response **on or before August 7, 2025 at 4:00 p.m. prevailing Eastern time** (the “Objection Deadline”).

At the same time, you must serve a copy of such response on the undersigned counsel so as to be received by the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion will be held **August 14, 2025 at 10:00 a.m. prevailing Eastern time** before the Honorable Craig T. Goldblatt, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Courtroom #7, Wilmington, Delaware 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent order may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security agreement.

[SIGNATURE ON NEXT PAGE]

Dated: July 9, 2025
Wilmington, Delaware

HOGAN MCDANIEL

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